



EX PARTE OR LATE FILED

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April 17, 1998

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BY HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Re: Oral and Written Ex Parte Presentation -
CC Docket No. 97-208

RECEIVED
APR 17 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Teleport Communications Group Inc. ("TCG") hereby gives notice of an oral and written ex parte presentation in the above-referenced proceeding on April 16, 1998. As part of its oral presentation, TCG furnished the attached written handout describing the OSS standards that should be met as a condition for Section 271 approval.

TCG's presentation was made to Lisa Choi, Jake Jennings, Andrea Kearney, Melissa Newman, Brent Olson, Jason Oxman and Joe Welch of the Common Carrier Bureau by Stephen Farkouh and the undersigned, of TCG.

Two copies of TCG's written presentation are submitted with this letter pursuant to Section 1.1206(b)(1) of the Commission's Rules, 47 C.F.R. § 1.1206(b)(1).

Sincerely,

Teresa Marrero

Enclosures

cc: Lisa Choi
Jake Jennings
Andrea Kearney
Melissa Newman

Brent Olson
Jason Oxman
Joe Welch

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OSS Access

A Facility-Based Carrier's View

April 16, 1998

Teleport Communications Group

TCG

Non-Discriminatory Access

➔ Statutory Requirement Seeks “Parity” Access to OSS:

- for **all** categories of operations (pre-ordering, ordering,...)
- for **all** aspects of communications (scope, accuracy, timeliness)
- for **all** modes of entry (interconnection, UNE, and resale)
- providing “a meaningful opportunity to compete”

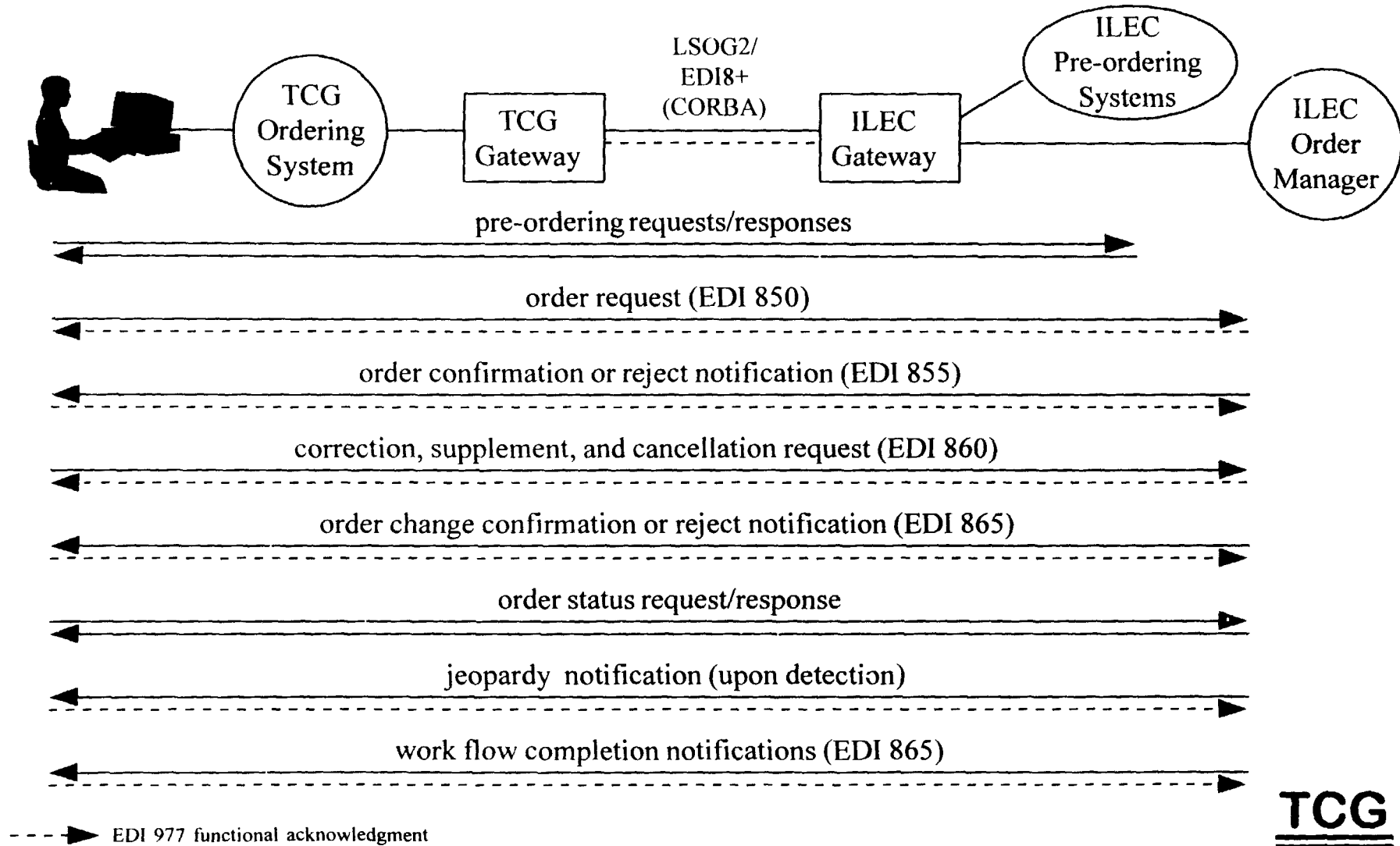
Meaningful Opportunity to Compete

- **Transparent Integration of Carrier Networks**
 - seamless integration of totally distinct, separate ILEC and CLEC networks
- **Parity in Service Delivery and Quality**
 - parity for provisioning UNEs must measure the ability to provide the underlying service, not just access to UNEs
- **Parity in the Maintenance of UNEs**
- **Operationally Ready OSS Systems/Interfaces**
 - commercially operational at competitive volumes

Current State of Affairs

- ILEC Focus Primarily on Total Resale
- UNE Coverage Slanted Towards UNE Combos
- ILEC OSS-UNE Solutions are Inadequate
 - Missing Access to OSS Functionality
 - Redundant Manual Processing (e.g., Order Re-Entry)
 - Lack of Electronic OSS-to-OSS Interconnection
- Facility-Based Carriers Not Being Offered a Meaningful Opportunity to Compete

Required Ordering/Pre-ordering Process

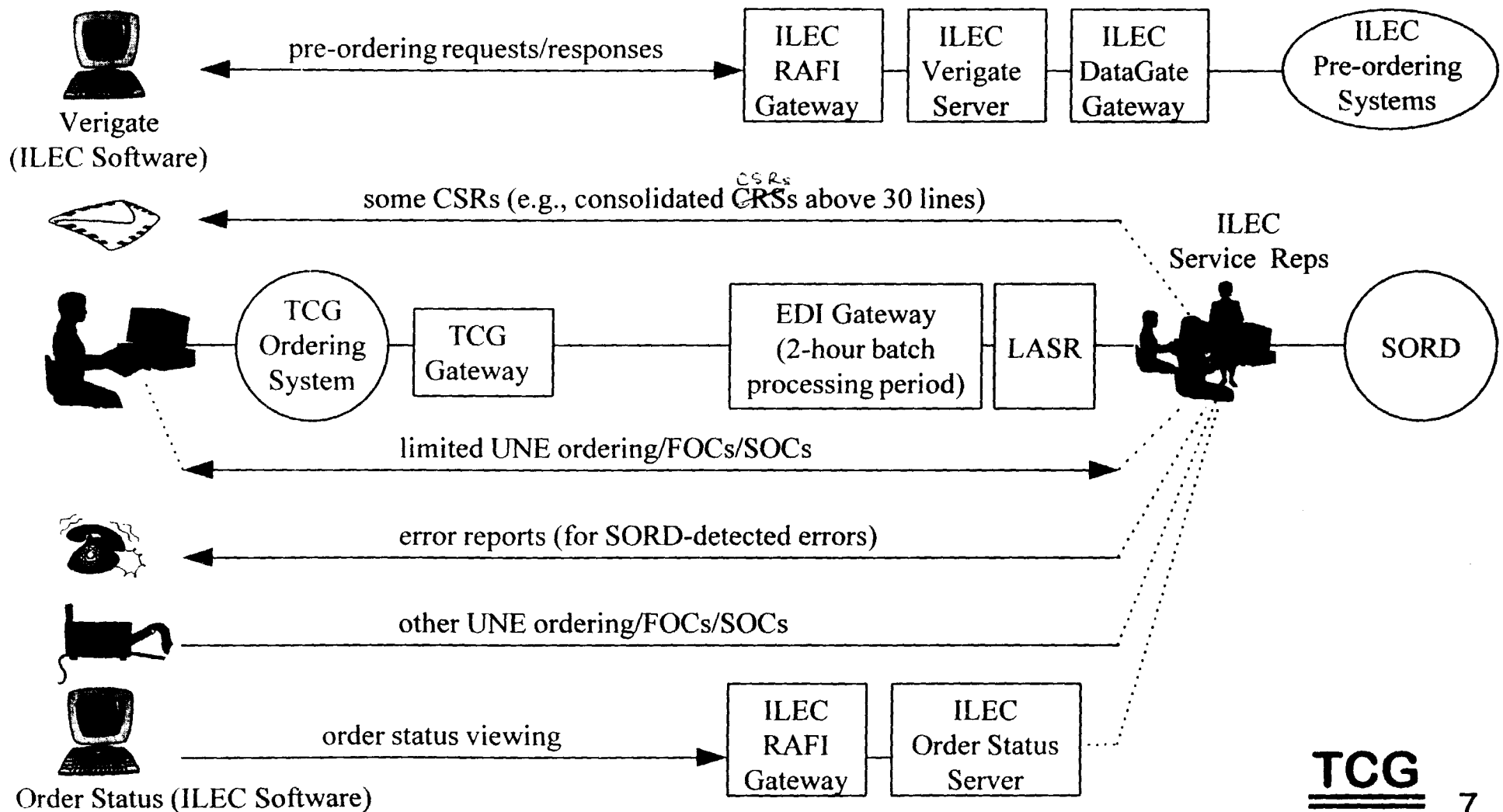


Required Ordering/Pre-ordering Process

- Key Features -

- Electronic OSS-to-OSS Interfaces
- Single Interface for **All** Ordering Functions
- Ability to Readily Integrate Pre-Ordering/Ordering
- Autonomous Reporting of Order Errors and Jeopardy
- Ability to Query for Order Status
- Autonomous Work Flow Confirmations
- Ability to Modify Pending Orders
- Support of Latest OBF/TCIF Ordering Standards
- Facilitated Migration to New Pre-Ordering Standards

An ILEC Ordering/Pre-ordering Process



An ILEC Ordering/Pre-ordering Process (Cont'd)

- Insufficient functionality
- Pre-ordering and ordering not integrated
 - direct DataGate Interface *may* offer some relief
- Current OBF/TCIF standard (LSOG2/EDI8) not supported
- EDI order processing may be delayed for up to 2 hours
- **100%** of all UNE orders fall out for manual re-entry
- SORD-detected errors in UNE orders reported via telephone
- Confirmations to electronically submitted order change requests will be electronically reported *where available*.
- No jeopardy notifications
- No work flow confirmations beyond SOC's
- Separate system and interface required for order status info

TCG's OSS Needs

➔ TCG is looking for ILEC OSS Solutions that:

- are functionally complete (parity in scope of info available)
- allow for seamless integration with existing TCG systems
- offer a manageable set of electronic OSS-OSS interfaces
- include stable and well tested interfaces and systems
- support latest standards and/or directions in standards
- offer parity in timeliness and accuracy of information
- are commercially operational at competitive volumes

TCG's OSS Access Needs (Cont'd)

- are well documented for both implementation and use
- are adequately supported by the ILEC (e.g., help desk)
- are cost-effective to implement and use
- are subject to mutually agreeable change management rules

Required Pre-Ordering Functionality

- Validate Service Address
- Retrieve Telephone Number
- Retrieve Customer Service Record (CSR)
- Check Service and Feature Availability
- Reserve Due Dates
- Schedule Appointments
- Retrieve Installation Intervals
- Retrieve PIC List
- Retrieve Customer PIC Information
- Facility Availability/Assignment
- Check Customer Credit History
- Retrieve Service History Information
- Retrieve Directory Listing Information

Required Ordering/Provisioning Functionality

- Request Service
- Modify Pending Service Orders
- Receive Firm Order Commitments (FOCs)
- Receive Jeopardy Notifications
- Receive Error Notifications
- Check Service Order Status
- Receive Workflow Confirmations
- Add/Update E911 Record
- Add/Update Directory Listings and Directory Assistance
- Coordinated Dispatch, Testing, and Turn-up

Required Maintenance/Repair Functionality

- Basic Trouble Administration (e.g., place and close trouble tickets)
- Retrieve Trouble History
- Coordinated Testing
- ★ ■ Receive Real-time Alarms
- ★ ■ Request Testing (UNE, Facility)
- ★ ■ Receive Performance Reports
- ★ ■ Receive Network Traffic Management Data
- ★ ■ Apply Incoming Traffic Controls (e.g., call gapping)

Required Billing Functionality

- Send/Receive Bills
- View Billing Information
- Reconcile Discrepancies
- Request Separation Information

Conclusion

- The OSS needs of a Facility-based Carrier go beyond those of a Reseller
- OSS access solutions for UNE are generally insufficient, placing Facility-based Carriers at a competitive disadvantage
- ILECs need to broadly apply the “parity principle” to support all modes of entry
- TCG has and will continue to identify and socialize their needs with industry.